

EXHIBIT A

KOVSKY-APAP DECLARATION

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

LORDSTOWN MOTORS CORP., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831-MFW

(Jointly Administered)

**DECLARATION OF DEBORAH KOVSKY-APAP IN SUPPORT OF APPLICATION
FOR ENTRY OF AN ORDER AUTHORIZING THE EMPLOYMENT AND
RETENTION OF TROUTMAN PEPPER HAMILTON SANDERS LLP AS COUNSEL
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
EFFECTIVE AS OF JULY 17, 2023**

I, Deborah Kovsky-Apap, pursuant to 28 U.S.C. § 1746, hereby declare that the following is true and correct to the best of my knowledge, information and belief:

1. I am a partner of the law firm of Troutman Pepper Hamilton Sanders LLP (“Troutman Pepper”), which maintains offices at, among other locations, 875 Third Avenue, New York, New York 10022. I am a member in good standing of the Bars of the States of New York, New Jersey and Michigan and I have been admitted to practice in each of those states. There are no disciplinary proceedings pending against me.

2. This declaration (the “Declaration”) is being submitted in support of the *Application for Entry of an Order Authorizing the Employment and Retention of Troutman Pepper Hamilton Sanders LLP as Counsel to the Official Committee of Unsecured Creditors Effective as of July 17, 2023* (the “Application”).² I make this Declaration pursuant to sections 328 and 1103 of the Bankruptcy Code, Bankruptcy Rule 2014 and Local Rule 2014-1.

3. Unless otherwise stated, I have personal knowledge of the facts set forth

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

² Capitalized terms used but not defined herein shall have the meaning ascribed to them in the Application.

hereinafter. To the extent that any information disclosed herein requires amendment or modification upon Troutman Pepper's completion of further analysis or as additional party-in-interest information becomes available to me, I will submit a supplemental verified statement to the Court.

TROUTMAN PEPPER'S PROCEDURES

4. In preparing this Declaration, I utilized a set of procedures established by Troutman Pepper to ensure compliance with the Bankruptcy Code and the Bankruptcy Rules regarding the employment of professionals serving bankruptcy estates under the Bankruptcy Code.

5. In that regard, I caused to be submitted the names of significant parties-in-interest in these cases that were provided to Troutman Pepper by Debtors' counsel for review under the conflict check system maintained by Troutman Pepper. Using information provided by the Debtors and additional information identified by Troutman Pepper, I compared the names of the Debtors and other key parties-in-interest (collectively, the "Searched Parties") to the names that Troutman Pepper has compiled into its conflict check system and adverse party index. A list of the Searched Parties is attached to this Declaration as **Exhibit 1**.

6. Troutman Pepper maintains and systematically updates this system in the regular course of business of the firm, and it is the regular practice of the firm to make and maintain these records. The conflict check system maintained by Troutman Pepper is designed to include (i) every matter for which the firm is now or has been engaged; (ii) the entity by which the firm is now or has been engaged; (iii) the identity of known related parties; (iv) the identity of known adverse parties; and (v) the attorney in the firm who is knowledgeable about the matter. It is the policy of Troutman Pepper that no new matter may be accepted or opened within the firm without completing and submitting to those charged with maintaining the conflict check system and adverse party index the information necessary to check each such matter for conflicts, including

the identity of the prospective client, the matter and related and adverse parties. Accordingly, the database is regularly updated for every new matter undertaken by Troutman Pepper. The scope of the system is a function of the completeness and accuracy of the information submitted by the attorney opening a new matter. Any matches between Troutman Pepper's conflict check system and the Searched Parties were identified ("Client Match List"), together with the names of the respective Troutman Pepper personnel responsible for current and former matters for the entities on such Client Match. From time to time, Troutman Pepper will update its disclosures as necessary.

TROUTMAN PEPPER'S CONNECTIONS

7. In accordance with Bankruptcy Rule 2014(a), Troutman Pepper hereby discloses its connections with the Debtors, their creditors, all other parties-in-interest, and their respective attorneys as follows:

a. Troutman Pepper began representing the Committee on July 17, 2023.

b. The Committee and Troutman Pepper have agreed that Troutman Pepper shall be paid a blended rate of \$750/hour for all timekeepers, to the extent allowed by the Court after application, notice, and hearing in accordance with the applicable provisions of the Bankruptcy Code and Rules. The Committee has also agreed that in the event the general unsecured creditors receive at least a 50% recovery in these chapter 11 cases, Troutman Pepper may apply to recover the difference (if any) between its standard hourly rates and the blended rate, subject to further Court approval.

c. Troutman Pepper ran the names of all parties in interest on **Exhibit 1** hereto through its conflict system. Troutman Pepper does not represent, or have any other

connection with any of the parties in interest listed on that exhibit, except as disclosed herein or on **Exhibit 2** hereto.

d. Troutman Pepper is not a creditor of the Debtors and has no direct or indirect relationship to, connection with, or interest in the Debtors, except as disclosed herein or on **Exhibit 2** hereto.

8. Through diligent inquiry, I have ascertained that there is no connection—as such term is utilized in section 101(14)(e) of the Bankruptcy Code and Bankruptcy Rule 2014(a)—between Troutman Pepper and (i) the United States Trustee or any person employed by the Office of the United States Trustee and (ii) any other party-in-interest, except as disclosed herein or on **Exhibit 2** attached hereto.

9. As part of its everyday practice, Troutman Pepper appears in numerous bankruptcy, litigation and other cases, proceedings and transactions, in which it has worked and is working with and against numerous attorneys, accountants, financial consultants, investment bankers and other professionals who represent or may in the future represent creditors or other parties-in-interest in these cases. Troutman Pepper has not and will not represent any of these entities in relation to the Debtors and these chapter 11 cases or have any relationship with any such entity, attorneys, accountants, financial consultants and investment bankers which would be adverse to the Debtors or their estates.

10. Troutman Pepper represented in the past five years, currently represents, or may represent in the future the entities listed on **Exhibit 2** or affiliates of such entities. Certain of the entities listed on **Exhibit 2** are former or inactive clients at this time. In the case of each of the entities listed on **Exhibit 2**, the revenues derived from those clients during the past calendar year represents less than 1% of the firm's revenues. Troutman Pepper has not in the past represented,

does not currently represent, and will not in the future represent, any of the entities listed on **Exhibit 2** in connection with these cases or in any matter adverse to the Debtors.

TROUTMAN PEPPER IS DISINTERESTED

11. To the best of my knowledge, information and belief, except as otherwise disclosed herein, neither I nor Troutman Pepper, its partners, counsel nor associates (a) are creditors, equity security holders or insiders of the Debtors, (b) are or were, within two years before the Petition Date, directors, officers or employees of the Debtors, (c) hold or represent any interest materially adverse to the interest of the Debtors' estates or (d) are related to any judge of this Court, the United States Trustee for the District of Delaware, or any employee of the United States Trustee in this District, except that (i) Edward C. Toole, Jr., an attorney at Troutman Pepper, is the husband of The Honorable Mary F. Walrath; Mr. Toole is not involved in this engagement; and (ii) United States Trustee trial attorneys Linda Casey, Hannah McCollum and John H. Schanne, II were formerly associates at Pepper Hamilton LLP,³ one of the predecessors of Troutman Pepper.

12. Based upon the information available to me, after following the procedures described herein, and except as otherwise described herein, neither Troutman Pepper nor any partner, associate, or counsel of the firm, insofar as I have been able to ascertain, holds or represents any interest adverse to the Debtors or their estates. Accordingly, I submit that Troutman Pepper is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code.

³ As of July 1, 2020, Troutman Sanders LLP and Pepper Hamilton LLP combined to become Troutman Pepper Hamilton Sanders LLP.

TROUTMAN PEPPER'S FEES AND EXPENSES

13. Troutman Pepper intends to apply to the Court for allowance of compensation and reimbursement of expenses in accordance with applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules and any orders entered by the Court.

14. The Committee has approved Troutman Pepper's proposed rates. The Committee and Troutman Pepper have agreed that Troutman Pepper shall be paid a blended rate of \$750/hour for all timekeepers, to the extent allowed by the Court after application, notice, and hearing in accordance with the applicable provisions of the Bankruptcy Code and Rules, *provided that* if the general unsecured creditors recover at least 50% in these chapter 11 cases, Troutman Pepper may apply to recover the difference (if any) between its standard hourly rates and the blended rate. Troutman Pepper's rates are traditionally adjusted by Troutman Pepper each January 1. Troutman Pepper's standard hourly rates, as of the Retention Date, which are adjusted from time to time, and currently range from \$740 to \$1,680 for partners and counsel, \$530 to \$850 for associates, and \$150 to \$440 for paraprofessionals.

15. I hereby represent that Troutman Pepper has not agreed to share with any person (except attorneys of Troutman Pepper) the compensation to be paid for the services rendered in these cases.

16. Troutman Pepper has not received a retainer.

PROFESSIONAL SERVICES TO BE RENDERED BY TROUTMAN PEPPER

17. The professional services that Troutman Pepper will render to the Committee include, but shall not be limited to, the following:

a. advise the Committee with respect to its rights, duties and powers in these cases;

b. assist and advise the Committee in its consultations with the Debtors relating to the administration of these cases;

c. assist the Committee in analyzing the claims of the Debtors' creditors and the Debtors' capital structure and in negotiating with the holders of claims and, if appropriate, equity interests;

d. assist the Committee's investigation of the acts, conduct, assets, liabilities and financial condition of the Debtors and other parties involved with the Debtors, and the operation of the Debtors' businesses;

e. assist the Committee in its analysis of, and negotiations with the Debtors or any other third parties concerning matters related to, among other things, the assumption or rejection of certain leases of non-residential real property and executory contracts, asset dispositions, financing transactions and the terms of a plan of reorganization or liquidation for the Debtors;

f. assist and advise the Committee as to its communications, if any, to the general creditor body regarding significant matters in this case;

g. represent the Committee at all hearings and other proceedings;

h. review, analyze, and advise the Committee with respect to applications, orders, statements of operations and schedules filed with the Court;

i. assist the Committee in preparing pleadings and applications as may be necessary in furtherance of the Committee's interests and objectives; and

j. perform such other services as may be required and are deemed to be in the interests of the Committee in accordance with the Committee's powers and duties as set forth in the Bankruptcy Code.

18. The retention of Troutman Pepper as counsel to the Committee will result in savings for the Debtors' estates because of Troutman Pepper's competitive fee structure and expertise.

19. Troutman Pepper will represent no entity other than the Committee in connection with the Debtors' chapter 11 cases. However, Troutman Pepper reserves the right to represent any successor in interest to the Committee or the unsecured creditors that is formed pursuant to a confirmed plan in these chapter 11 cases or a creditor trust agreement.

STATEMENT REGARDING U.S. TRUSTEE GUIDELINES

20. As required by the Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases, effective November 1, 2013 (the "U.S. Trustee Guidelines"), Troutman Pepper responds to the questions set forth in Section D of the U.S. Trustee Guidelines as follows:

- a. Troutman Pepper did not agree to a variation of its standard or customary billing arrangement for this engagement. Nonetheless, as described above, Troutman Pepper did agree to provide the Committee with a discount of any fees in excess of a \$750/hour blended rate, subject to recoupment in some circumstances.
- b. None of the professionals included in this engagement have varied their rate based on the geographic location of these chapter 11 cases.
- c. Troutman Pepper did not represent the Committee in the 12 months prepetition.
- d. Troutman Pepper and the Committee have developed an initial budget and staffing plan. Troutman Pepper and the Committee expect to develop periodic supplemental budgets and staffing plans to comply with the U.S. Trustee's requests for information and additional disclosures, and any orders of this Court for the post-petition period. In accordance with the U.S. Trustee Guidelines, and recognizing the unforeseeable fees and expenses that may arise in a large chapter 11 case, Troutman Pepper and the Committee may need to amend the budget as necessary to reflect changed circumstances or unanticipated events. The budget and staffing

plan are intended as estimates and not caps or limitations on fees or expenses that may be incurred or on the number or identity or professionals or paraprofessionals who may provide services to the Committee in these chapter 11 cases.

FURTHER DISCLOSURES

I will amend this statement promptly upon my learning that (i) any of the within representations are incorrect or (ii) there is any change of circumstance relating thereto.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

Dated: August 7, 2023

/s/ Deborah Kovsky-Apap

Deborah Kovsky-Apap

EXHIBIT 1

SEARCHED PARTIES

List of Potentially Interested Parties

Debtor Entities

1. Lordstown Motors Corp. (DE)
2. Lordstown EV Corp. (DE)
3. Lordstown EV Sales LLC (DE)

Related/Former Names of Entities

1. DiamondPeak Holdings Corp. (n/k/a Lordstown Motors Corp.)
2. DPL Merger Sub Corp. (n/k/a Lordstown EV Corporation)
3. MIH EV Design, LLC

Directors and Officers

1. Adam Kroll
2. Angela Strand
3. Dale Spencer
4. Daniel Ninivaggi
5. David T. Hamamoto
6. Donna Bell
7. Edward T. Hightower
8. Jane Reiss
9. Joseph B. Anderson Jr.
10. Keith Feldman
11. Laura Soave
12. Melissa Leonard

Former Directors and Officers

1. Jane Ritson-Parsons
2. John LeFleur
3. John R. Whitcomb
4. Michael Gates
5. Mickey Kowitz
6. Martin Rucidlo
7. Rebecca Roof
8. Stephen S. Burns
9. Thomas V. Canepa

Senior Employees

1. Cheryl Johnson
2. Darren Post
3. Jill Coniglio-Kirk
4. Carter Driscoll
5. Michael Port
6. Raghu Aerabati
7. Waqar Hashim
8. Andrew Reyntjes

Top Unsecured Creditors

1. Amphenol Interconnect Products Corporation
2. AP Expert Group LLC
3. AT&T MOBILITY-CC
4. Barry L. Leonard and Company Inc. dba Trans Machine Technologies
5. Bossard Inc.
6. CEVA Contract Logistics US Inc
7. Cognizant Mobility, Inc
8. Elaphe Propulsion Technologies LTD
9. Fiberdyne Research Pty Ltd
10. Filec Production SAS - Amphenol
11. Foxconn EV System LLC
12. Greatech Intergration (M) SDN.BHD.
13. Harco Manufacturing Group, LLC
14. HRB Industries Corp.
15. JVIS USA LLC
16. Laval Tool & Mould LTD.
17. Marelli North America Inc dba CalsonicKansel North America Inc
18. Meta Systems SpA
19. Nexteer Automotive Corporation
20. Pektron EV Limited
21. Proper Group Holdings LLC dba Proper Tooling LLC
22. Quality MetalCraft Inc.
23. SA Automotive LTD
24. Sharp Dimension Inc
25. St. Clair Technologies Inc.
26. Superior Cam Inc
27. Technology Solutions Anywhere LLC dba Readysoft
28. Teijin Automotive Technologies, Inc

List of Potentially Interested Parties

29. The Timken Corporation
30. Three-Dimensional Services dba 3 Dimensional Services Group
31. thyssenkrupp Materials NA, Inc. dba Ken-Mac Metals or thyssenkrupp Steel Services
32. Ventra Group Co. dba Flex-N-Gate Bradford
33. VIA Optronics LLC
34. Zetwerk Manufacturing USA, Inc.
35. ZF Passive Safety Systems US Inc.

Cash Management Banks

1. JP Morgan Asset Management
2. JP Morgan Chase Bank, N.A.
3. JP Morgan Institutional Investments Global Liquidity
4. JP Morgan Prime
5. JP Morgan Securities

Significant Lease and Contract Counterparties

1. 275 Hills Tech Ventures LLC
2. Aon (Bermuda) Ltd.
3. Aon Risk Services Central Inc.
4. Aon UK Limited
5. Arthur J. Gallagher Risk Management Services, Inc.
6. Applied Medical Resources Corporation
7. Cigna Health and Life Insurance Company
8. Elaphe Propulsion Technologies Ltd.
9. Foxconn EV Property Development LLC
10. Foxconn EV System LLC
11. GAC R&D Center Detroit, LLC
12. General Motors
13. GM EV Holdings LLC
14. Liberty Property and Asset Management
15. Michigan Strategic Fund
16. Paylocity Corporation
17. Principal Life Insurance Company
18. TenantBase, Inc.
19. TransAmerica Corporation

20. Willowgreen Building Group, LLC
21. Workhorse Group Inc.

Significant Vendors

1. A Say Inc dba Say Communications LLC
2. A.K.Stamping Company, Inc
3. ABSOLUTE ELECTRONICS INC
4. Akebono Brake Company
5. Amphenol Interconnect Products Corporation
6. Anchor Tool and Die Company dba Anchor Manufacturing Group, Inc.
7. Anderton Castings SAS
8. AP Expert Group LLC
9. Armada Toolworks LTD.
10. AT&T MOBILITY-CC
11. ATCO Industries, Inc.
12. Auto Motive Power Inc
13. Baker Hostetler
14. Barry L. Leonard and Company Inc. dba Trans Machine Technologies
15. Bennie W Fowler, LLC
16. Bossard Inc.
17. Brikho & Kallabat, P.C. DBA Joseph Kallabat and Associates, PC
18. CEVA Contract Logistics US Inc
19. CEVA International, Inc
20. CITIC Dicastal Co., Ltd.
21. Cognizant Mobility, Inc
22. Cognizant Worldwide Limited
23. Complete Discovery Source, Inc (CDS)
24. Contour Hardening Inc.
25. Cox Automotive Mobility Solutions, Inc
26. Cox Automotive, Inc - Manheim
27. Custodial Building Services, Inc
28. DAG LTD, LLC
29. Detroit Engineered Products dba DEP
30. Duggan Manufacturing LLC
31. Elaphe Propulsion Technologies LTD
32. Fiberdyne Research Pty Ltd
33. Filec Production SAS - Amphenol
34. Foshan Aoya Electrical and Mechanical Co., Ltd.

List of Potentially Interested Parties

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| <p>35. Foxconn EV Property Development LLC</p> <p>36. Foxconn EV System LLC</p> <p>37. Greatech Intergration (M) SDN.BHD.</p> <p>38. Harco Manufacturing Group, LLC</p> <p>39. Haynes and Boone, LLP</p> <p>40. HRB Industries Corp</p> <p>41. HubSpot Inc</p> <p>42. IEE S.A.</p> <p>43. Infosys Limited</p> <p>44. Jiangyin Haida Rubber and Plastic Co., Ltd. dba Haida</p> <p>45. JVIS USA LLC</p> <p>46. KPMG LLP</p> <p>47. Lasky, LLC</p> <p>48. Laval Tool & Mould LTD.</p> <p>49. Logicalis, Inc.</p> <p>50. Lumma Clean LLC</p> <p>51. Mahle Behr USA Inc</p> <p>52. Mainfreight, Inc - Canada</p> <p>53. Mainfreight, Inc.</p> <p>54. Marelli North America Inc dba CalsonicKansel North America Inc</p> <p>55. Megatronix (Beijing) Technology Co., Ltd.</p> <p>56. Meta Systems SpA</p> <p>57. Miotti Srl</p> <p>58. Mosaic Corporation</p> <p>59. MSSC US INC.</p> <p>60. New Eagle, LLC</p> <p>61. Nexteer Automotive Corporation</p> <p>62. OpenText Inc.</p> <p>63. Payscale Inc</p> <p>64. Pektron EV Limited</p> <p>65. Pi Innovo LLC</p> <p>66. Pierburg US LLC</p> <p>67. Potter Anderson & Corron LLP</p> <p>68. Principal Life Insurance Company</p> <p>69. Proper Group Holdings LLC dba Proper Tooling LLC</p> <p>70. Quality MetalCraft Inc.</p> <p>71. Racar Engineering, LLC</p> <p>72. Ready Logistics, LLC</p> <p>73. Roush Industries, Inc.</p> <p>74. RTL Systems, LLC</p> <p>75. SA Automotive LTD</p> | <p>76. Schwab Industries, Inc.</p> <p>77. SG Automotive d.o.o.</p> <p>78. Sharp Dimension Inc</p> <p>79. Sherpa Commercial Vehicles, LLC</p> <p>80. Silverman Consulting, Inc</p> <p>81. Simpson Thacher & Bartlett LLP</p> <p>82. Socotec Advisory, LLC</p> <p>83. St. Clair Technologies Inc.</p> <p>84. Sullivan & Cromwell LLP</p> <p>85. Superior Cam Inc</p> <p>86. Sybridge Technologies Canada, Inc</p> <p>87. Technology Solutions Anywhere LLC dba Readysoft</p> <p>88. Teijin Automotive Technologies, Inc</p> <p>89. TERIS - Phoenix LLC DBA TERIS</p> <p>90. The Timken Corporation</p> <p>91. Three-Dimensional Services dba 3 Dimensional Services Group</p> <p>92. thyssenkrupp Materials NA, Inc. dba Ken-Mac Metals or thyssenkrupp Steel Services</p> <p>93. Transportation Research Center, Inc. dba TRC, Inc.</p> <p>94. Triple Crown Consulting, LLC</p> <p>95. TTI, INC dba Symmetry Electronics (a division of TTI, Inc.) and RFMW(a division of TTI, Inc.)</p> <p>96. Ventra Group Co. dba Flex-N-Gate Bradford</p> <p>97. VIA Optronics LLC</p> <p>98. Victora Auto Private Limited</p> <p>99. Zetwerk Manufacturing USA, Inc</p> <p>100. ZF PASSIVE SAFETY SYSTEMS US INC.</p> |
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| | <p>Customers</p> <p>1. Army Contracting Command - Detroit Arsenal (ACC-DTA)</p> <p>2. City of Washington, D.C.</p> <p>3. Greenstreet EV Inc.</p> <p>4. JoeyB QB LLC</p> <p>5. Pratt & Miller Engineering & Fabrication LLC</p> <p>6. San Diego Unified Port District</p> <p>7. Sherpa Commercial Vehicles LLC</p> |
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List of Potentially Interested Parties

Investors with over 5% Holdings

1. Foxconn (Far East) Limited
2. Foxconn EV Technology, Inc.
3. Foxconn Ventures Pte. Ltd.
4. Foxtek Holdings Inc.
5. Foxtek Integration Inc.
6. Hon Hai Precision Industry Co., Ltd.
7. Hon Hai Technology Group
8. PCE Paragon Solutions Kft.

Debtor Restructuring Professionals

1. Jefferies Group LLC
2. Kurtzman Carson Consultants, LLC
3. Richards Layton & Finger, P.A.
4. Silverman Consulting, Inc.
5. White & Case LLP

Ordinary Course Professionals & Professionals of Parties in Interest

1. Akin Gump Strauss Hauer & Feld LLP
2. Ankura Intermediate Holdings, LP dba Ankura Consulting Group LLC
3. Baker & Hostetler LLP
4. Bernstein Litowitz Berger & Grossman, LLP
5. Bodman PLC
6. Climaco, Wilcox, Peca, Tarantino & Garofoli
7. Cohen Rosenthal & Kramer
8. Cooch and Taylor
9. Cummins Law
10. deLeeuw Law LLC
11. Dechert LLP
12. Deloitte & Touche LLP
13. Dentons US
14. Dittmer, Wagoner & Steele
15. Elfvin, Klingshirn, Royer & Torch, LLC
16. Employment Law Partners
17. Entwistle & Cappucci LLP
18. Ernst & Young U.S. LLP
19. Fisher and Phillips LLP
20. Foley & Lardner LLP

21. FTI Consulting, Inc.
22. Gladstein, Neandross & Associates
23. Hagens Berman Sobol Shapiro LLP
24. Haynes and Boone, LLP
25. Kaskela Law LLC
26. Kooperman Mentel Ferguson Yaross
27. KPMG LLP
28. Labaton Sucharow LLP
29. Latham & Watkins LLP
30. Law Office of Daniel R. Karon
31. Lasky, LLC
32. Lifshitz Law PLLC
33. Long Law, LLC
34. Mercer Capital Management, Inc.
35. Merriman Legando Williams & Klang
36. Murray, Murphy, Moul & Basil
37. Nelson Mullins Riley & Scarborough LLP
38. Paul Hastings LLP
39. Perantinides & Nolan
40. Perez & Morris
41. Phillips ADR Enterprises PC
42. Pomerantz LLP
43. Potter Anderson & Corroon LLP
44. Prospect Law LLP
45. Purcell & Lefkowitz LLP
46. Robbins Geller Rudman & Dowd
47. RSM US LLP
48. Saxena White
49. Schall Law
50. Schubert Jonckheer & Kolbe LLP
51. Seyfarth Shaw LLP
52. Shapiro Haber & Urmy LLP
53. Simpson Thacher & Bartlett LLP
54. Socotec Advisory, LLC
55. Strauss Troy
56. Sullivan & Cromwell LLP
57. The Brown Law Firm, P.C.
58. The Rosen Law Firm, P.A.
59. Winston & Strawn LLP
60. WIT Legal, LLC
61. Zoll & Kranz

List of Potentially Interested Parties

Insurance Parties

1. Accredited Specialty Insurance Company
2. Allied World Specialty Insurance Company
3. Associated Industries Insurance Co., Inc
4. AXIS Insurance Company
5. Berkley Insurance Company
6. CFC Underwriting / Lloyds
7. Continental Casualty Company
8. Endurance Assurance Corporation
9. Fair American Insurance & Reinsurance Co
10. Gemini Insurance Company
11. General Star Indemnity Company
12. Hudson Insurance Company
13. Ironshore Specialty Insurance Company
14. Magna Carta Insurance Ltd. / Lloyds
15. National Union Fire Ins Co of Pittsburgh, PA
16. RSUI Indemnity Company
17. RT Specialty Insurance Services, LLC
18. Samsung Fire & Marine Ins Co Ltd (US Br)
19. SiriusPoint Bermuda Insurance Company
20. The Cincinnati Indemnity Company
21. The Cincinnati Insurance Company
22. Underwriters At Lloyds London
23. Westfield Specialty Insurance Comp
24. XL Specialty Insurance Company

Utilities

1. AT&T Business Direct
2. AT&T MOBILITY-CC
3. Comcast Holdings Corporation dba Comcast Cable Communication Management LLC
4. Cox Communications California LLC dba Cox Business
5. CR&R Environmental Services
6. Detroit Disposal & Recycling
7. Irvine Ranch Water District
8. Sonitrol Orange County

9. Southern California Edison
10. Southern California Gas Company dba The Gas Company; So Cal Gas

Taxing and Regulatory Authorities

1. California Franchise Tax Board
2. California Department of Tax and Fee Administration
3. California State Board of Equalization
4. Committee on Foreign Investment in the United States
5. Delaware Secretary of State
6. Delaware State Treasury
7. Delaware Tax Authority
8. Internal Revenue Service
9. Michigan Department of Treasury
10. National Highway Traffic Safety Administration
11. Ohio Bureau of Workers' Compensation
12. Ohio Department of Taxation
13. Orange County Property Taxes
14. Pipeline and Hazardous Materials Safety Administration
15. Securities and Exchange Commission
16. U.S. Department of Justice
17. U.S. Patent and Trademark Office
18. Village of Lordstown, OH Income Tax Department

Litigation Parties

1. Alicia Kelley
2. An Thai
3. Andrew C. Richardson
4. Angela Strand Boydston
5. Ashith Pabbathi
6. Atri Amin
7. Bei Qin
8. Benjamin Herbert
9. Caimin Flannery
10. Carole Cooper
11. Christopher Kim
12. Chuan D. Vo
13. Claude L. Patterson
14. Dale G. Spencer

List of Potentially Interested Parties

15. Dan Zhihong Huang
16. Daniel J. Cohen
17. Daniel Tavares
18. Dari Tehrani
19. Darren Post
20. David M. Cohen
21. David T. Hamamoto
22. Ed Lomont
23. Eskander Tehrani
24. Ethan Fingerer
25. Evaristo Sarabia
26. FNY Managed Accounts LLC
27. George Troicky
28. Globestar Systems Inc.
29. Gurpreet Singh
30. Herbert Stotler
31. Hong Xin Huan (a/k/a George Huan)
32. Jane Reiss
33. Janelle Jackson
34. Jesse Brury
35. John H. Jenkins
36. John LeFleur
37. John Vo
38. Joshua Betof
39. Judith A. Hannaway
40. Julio C. Rodriguez
41. Karma Automotive LLC
42. Keith A. Feldman
43. Kenneth Davenport
44. Kevin Levent
45. Kin San Chan
46. M.R.S. Leasing Corporation LTD
47. Mario Guerrero
48. Mark A. Walsh
49. Martin J. Rucidlo
50. Matthew Rico
51. Michael Fabian
52. Michael D. Gates
53. Mickey W. Kowitz
54. Mohammed Chowdhury
55. Phil Richard Schmidt
56. Pnina Cohen
57. Punak Engineering, Inc.
58. Randy Slipher
59. Raymond Romano
60. Robert Miller

61. Robert Palumbo
62. Roger J. Durre
63. Shane Brown
64. Simha Cohen
65. Stephen Punak
66. Stephen S. Burns
67. Steven R. Hash
68. Steven Terry
69. Sulayman Zuod
70. DiamondPeak Sponsor LLC
71. Silverpeak and related entities (which includes SP SPAC Sponsor LLC, Silverpeak Real Estate Partners L.P., Silverpeak Strategic Partners LLC, Silverpeak Credit Partners LP, Silverpeak Renewables Investment Partners LP, and certain other affiliated entities)

Lien Holders

1. Competition Engineering, Inc.
2. Foxconn EV Technology, Inc.
3. Hewlett-Packard Financial Services Company
4. Peterson Jig and Fixture, Inc.
5. Precision Jig and Fixture
6. Proper Tooling, LLC & Proper Group International, LLC

Office of the United States Trustee (Wilmington, DE)

1. Andrew Vara
2. Benjamin Hackman
3. Christine Green
4. Denis Cooke
5. Diane Giordano
6. Dion Wynn
7. Edith A. Serrano
8. Hannah M. McCollum
9. Holly Dice
10. James R. O'Malley
11. Jane Leamy
12. Joseph Cudia
13. Joseph McMahon
14. Juliet Sarkessian

List of Potentially Interested Parties

15. Karen Starr
16. Lauren Attix
17. Linda Casey
18. Linda Richenderfer
19. Michael Panacio
20. Nyanquoi Jones
21. Richard Schepacarter
22. Rosa Sierra-Fox
23. Shakima L. Dortch
24. Timothy J. Fox, Jr.

United States Bankruptcy Judges in the District of Delaware

1. Ashley M. Chan
2. Brendan L. Shannon
3. Craig T. Goldblatt
4. John T. Dorsey
5. Karen B. Owens
6. Kate Stickles
7. Laurie S. Silverstein
8. Mary F. Walrath
9. Thomas M. Horan

Other Parties in Interest

1. Softbank
2. Blackrock Institutional Trust Company,
N.A.
3. Blackrock

EXHIBIT 2**DISCLOSURES**

<u>Name</u>	<u>Relationship to Debtors</u>	<u>Relationship to Troutman</u>
Akin, Gump, Strauss, Hauer & Feld, L.L.P.	Ordinary Course Professional	Current client in unrelated matter(s).
Allied World Specialty Insurance Company	Insurance Parties	Affiliate of current client in unrelated matter(s).
Arthur J. Gallagher Risk Management Services, Inc.	Significant Lease and Contract Counterparties	Affiliate of current client in unrelated matter(s).
Associated Industries Insurance Co., Inc.	Insurance Parties	Current client in unrelated matter(s).
AT&T Business Direct	Utilities	Affiliate of current client in unrelated matter(s).
AXIS Insurance Company	Insurance Parties	Current client in unrelated matter(s).
AT&T Mobility-CC	Utilities	Current client in unrelated matter(s).
Berkley Insurance Company	Insurance Parties	Affiliate of current client in unrelated matter(s).
Cigna Health and Life Insurance Company	Significant Lease and Contract Counterparties	Current client in unrelated matter(s).
Continental Casualty Company	Insurance Parties	Current client in unrelated matter(s).
General Motors	Significant Lease and Contract Counterparties	Affiliate of current client in unrelated matter(s).
General Star Indemnity Company	Insurance Parties	Current client in unrelated matter(s).
Infosys Limited	Significant Vendors	Current client in unrelated matter(s).
Ironshore Specialty Insurance Company	Insurance Parties	Current client in unrelated matter(s).
JP Institutional Investments Global Liquidity	Cash Management Banks	Affiliate of current client in unrelated matter(s).
JP Morgan Asset Management	Cash Management Banks	Affiliate of current client in unrelated matter(s).
JP Morgan Chase Bank	Cash Management Banks	Affiliate of current client in unrelated matter(s).

<u>Name</u>	<u>Relationship to Debtors</u>	<u>Relationship to Troutman</u>
JP Morgan Prime	Cash Management Banks	Affiliate of current client in unrelated matter(s).
JP Morgan Securities	Cash Management Banks	Affiliate of current client in unrelated matter(s).
Nelson Mullins Riley & Scarborough LLP-	Ordinary Course Professional	Current client in unrelated matter(s).
Principal Life Insurance Company	Significant Lease and Contract Counterparties	Current client in unrelated matter(s).
Samsung Fire & Marine Ins Co Ltd (US Br)	Insurance Parties	Current client in unrelated matter(s).
Southern California Edison	Utilities	Current client in unrelated matter(s).
TTI, Inc dba Symmetry Electronics (A division of TTI, Inc.) and RFMW (A division of TTI, Inc.)	Significant Vendors	Current client in unrelated matter(s).
Underwriters at Lloyd's of London	Insurance Parties	Affiliate of current client in unrelated matter(s).
Ventra Group Co. dba Flex-N-Gate Bradford	Top Unsecured Creditor	Current client in unrelated matter(s).
XL Specialty Insurance Company	Insurance Parties	Current client in unrelated matter(s).